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2 Including Professional Corporations  
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12 Attorneys for Defendants  
KAISER FOUNDATION HEALTH PLAN and  
13 KAISER FOUNDATION HEALTH PLAN  
NORTHERN CALIFORNIA REGION  
14

15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17 GRACE SMITH and RUSSELL RAWLINGS,  
on behalf of themselves and all others  
18 similarly situated, and CALIFORNIA  
FOUNDATION FOR INDEPENDENT  
19 LIVING CENTERS, a California nonprofit  
corporation,  
20

21 Plaintiffs,

22 v.  
23

24 MARY WATANABE, in her capacity as  
Director of the California Department of  
Managed Health Care; CALIFORNIA  
25 DEPARTMENT OF MANAGED HEALTH  
CARE; KAISER FOUNDATION HEALTH  
26 PLAN, INC., and KAISER FOUNDATION  
HEALTH PLAN NORTHERN CALIFORNIA  
27 REGION,  
28

Defendants.

Case No. 4:21-cv-07872-HSG

**STIPULATION FOR EXTENSION OF  
TIME TO FILE RESPONSE TO FIRST  
AMENDED COMPLAINT**

The Hon. Haywood S. Gilliam, Jr.

**JOINT STIPULATION**

Plaintiffs Grace Smith, Russell Rawlings, and the California Foundation For Independent Living Centers (“Plaintiffs”), Defendants Mary Watanabe and the California Department of Managed Health Care, and Defendants Kaiser Foundation Hospitals and Kaiser Foundation Health Plan, Inc. (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and agree as follows:

1. WHEREAS, Plaintiffs filed the operative Class Action Complaint on October 7, 2021;
2. WHEREAS, no response has been filed to the Class Action Complaint;
3. WHEREAS, Plaintiffs filed a First Amended Class Action Complaint on November 19, 2021; and
4. WHEREAS, Defendants have requested, and Plaintiffs have agreed, that Defendants’ deadline to respond to the First Amended Complaint will be extended to January 21, 2022.

THEREFORE, it is hereby stipulated between the parties, through their respective counsel of record, that Defendants’ deadline to respond to the First Amended Complaint will be Friday, January 21, 2022.

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1 Dated: November 29, 2021

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4 By /s/ Moe Keshavarzi  
5 MOE KESHAVARZI  
6 JOHN T. BROOKS  
7 A. ALEXANDER KULJIS  
8 Attorneys for Defendants  
9 Kaiser Foundation Health Plan and Kaiser Foundation  
10 Health Plan Northern California Region  
11

12 Dated: November 29, 2021

13 By /s/ Carolyn Tsai  
14 CAROLYN TSAI  
15 Attorney for Mary Watanabe and California  
16 Department of Managed Health Care  
17

18 Dated: November 29, 2021

19 By /s/Claudia Center  
20 CLAUDIA CENTER  
21 SILVIA YEE  
22 CARLY A. MYERS  
23 ERNEST GALVAN  
24 MICHAEL S. NUNEZ  
25 Attorneys for Plaintiffs  
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**FILER'S ATTESTATION**

Pursuant to Civil Local Rule 5-1(h)(3), I, Moe Keshavarzi, attest that concurrence in the filing of this document has been obtained.

Dated: November 29, 2021

/s/ Moe Keshavarzi

MOE KESHAVARZI

[3821816.1] SMRH:4876-2075-6740.1